



Washington
Stamford
Los Angeles
San Diego
London
New York
Palo Alto
Boston

ML Strategies, LLC

701 Pennsylvania Avenue, N.W.
Washington, D.C. 20004 USA
202 296 3622
202 434 7400 fax
www.mlstrategies.com

Alex Hecht
Vice President
Direct Dial 202 434 7333

July 5, 2016

Via Electronic Filing

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Written Ex Parte In the matter of *Ensuring Customer Premises Equipment Backup Power for Continuity of Communications* (PS Docket No. 14-174); *Technology Transitions* (GN Docket No. 13-5); *Policies and Rules Governing Retirement of Copper Loops by Incumbent Local Exchange Carriers* (RM 11358); *Special Access for Price Cap Local Exchange Carriers* (WC Docket No. 05-25); *AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services* (RM-10593)

Dear Ms. Dortch:

On Thursday, June 30, Paul Plofchan, VP of Government and Regulatory Affairs for ADT, and Steve Shapiro, VP of Product Solutions for ADT, along with Alex Hecht, Rachel Nemeth, and Erin Morton of ML Strategies, met by phone with Peter Saharko, Assistant Division Chief, Competition Policy Division. The purpose of this meeting was to follow-up on a previous meeting where ADT discussed proposed rules governing the adoption of Managed Facilities Voice Network ("MFVN") standards to ensure that customers with critical life safety and security systems do not lose capabilities during Technology Transitions.¹

The above listed participants discussed the designation of alarm services as a key application and the factors for demonstrating persuasive evidence of interoperability with key applications and functionality during Technology Transitions. ADT appreciates that the Commission is considering including MFVN standards in the framework for determining interoperability during and after the IP Transition.² In addition, ADT continues to advocate for MFVN standards to be included in the checklist for ensuring interoperability in Technology Transitions. In addition to

¹ See *ex parte* filing of ADT, GN Docket No. 13-5, et. al. (filed April 15, 2016).

² Technology Transitions Order and Further Notice of Proposed Rulemaking, GN Docket No. 15-5, et. al. at para. 221 (released Aug. 6, 2015).

demonstrating full functionality and connectivity, the communications network provider should provide data demonstrating proper installation in accordance with established industry standards and original equipment manufacturer (OEM) instructions.

Historically, the alarm industry has successfully implemented MFVN standards agreements in order to ensure interoperability between alarm and communications services. ADT has discussed the success of these agreements with the Commission and is on record throughout this docket in support of incorporating a framework based on MFVN standards to ensure interoperability in this and future technology transitions.³ The Alarm Industry Communications Committee (AICC) also addresses interoperability by discussing MFVN standards throughout Comments and Replies filed in February and March of 2015, respectively.⁴

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed via ECFS, and a copy will be provided via email to the attendees.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alex Hecht', with a long, sweeping horizontal line extending to the right.

Alex Hecht
Vice President of Government Relations
ML Strategies

Cc: Peter Saharko, Assistant Division Chief, Competition Policy Division, WCB

³ See Comments of ADT, GN Docket No. 13-5, et. al. (filed Feb. 5, 2015); *ex parte* filing of ADT, GN Docket No. 13-5, et. al, (filed March 20, 2015); *ex parte* filing of ADT, GN Docket No. 13-5, et. al, (filed April 15, 2015); *ex parte* filing of ADT, GN Docket No. 13-5, et. al, (filed June 10, 2015).

⁴ See Comments of Alarm Industry Communications Committee (AICC), GN Docket No. 13-5 et. al. (filed Feb. 5, 2015); Reply Comments of AICC, GN Docket No. 13-5 et. a. (filed March 9, 2015).